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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA, SOUTHERN DIVISION**  
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13 T1 PAYMENTS LLC, a Nevada limited  
14 liability company,

15 Plaintiff,

16 vs.

17 NEW U LIFE CORPORATION, a  
18 California corporation,

19 Defendant.

20 NEW U LIFE CORPORATION, a  
21 California corporation,

22 Counterclaimant,

23 vs.

24 T1 PAYMENTS LLC, a Nevada limited  
25 liability company, et al.,

26 Counterclaim-Defendants.  
27  
28

Case No. 2:19-cv-01816-ART-DJA

ORDER APPROVING

**JOINT MOTION TO STAY  
PROCEEDINGS**

**[SPECIAL APPEARANCE ONLY]**

1 IT IS HEREBY STIPULATED AND AGREED, by and between all interested parties  
2 to this stipulation, Plaintiff NEW U LIFE CORPORATION (“New U Life”), by and through  
3 its counsel, the law firms of Rome & Associates and Brown Brown & Premsrirut, and **BY**  
4 **SPECIAL APPEARANCE ONLY**, Defendant PAYVISION B.V. (“Payvision B.V.”), by  
5 and through its counsel, the law firms of Gibbs Giden Locher Turner Senet & Wittbrodt and  
6 Musick, Peeler & Garrett LLP (collectively, the “Parties”), stipulate and agree as follows:

7 1. On May 12, 2022, New U Life filed a Second Amended Counterclaim *inter*  
8 *alia* against Payvision B.V.

9 2. On June 13, 2022, Payvision B.V. filed a motion to dismiss the Second  
10 Amended Counterclaim pursuant to Federal Rules of Civil Procedure Rules 12(b)(2),  
11 12(b)(6), and 9(b) (the “Motion to Dismiss”).

12 3. On July 18, 2022, New U Life filed an Opposition to the Motion to Dismiss.

13 4. On August 1, 2022, Payvision B.V. filed a Reply to New U Life’s Opposition  
14 to the Motion to Dismiss.

15 5. On August 19, 2022, New U Life filed a Motion for Leave to File Sur-Reply  
16 in Response to Payvision B.V.’s Reply to New U Life’s Opposition to the Motion to Dismiss  
17 (the “Motion for Leave to File Sur-Reply”).

18 6. On September 2, 2022, Payvision B.V. filed an Opposition to the Motion for  
19 Leave to File Sur-Reply.

20 7. On September 9, 2022, New U Life filed a Reply to Payvision B.V.’s  
21 Opposition to the Motion for Leave to File Sur-Reply.

22 8. The Court has not yet ruled on the Motion to Dismiss or the Motion for Leave  
23 to File Sur-Reply.

24 9. On November 18, 2022, Payvision B.V. and New U Life reached a tentative  
25 settlement.

26 10. To allow Payvision B.V. and New U Life time to negotiate the terms of the  
27 settlement agreement and to not jeopardize the settlement, on November 21, 2022, the  
28 Parties agreed that the Court should stay the proceedings as it relates to the Motion to

1 Dismiss and the Motion for Leave to File Sur-Reply for fourteen days, *i.e.*, to December 5,  
2 2022.

3 11. On November 21, 2022, the Parties filed the foregoing stipulation and a  
4 proposed order to the Court [Dkt. No. 292].

5 12. On November 23, 2022, the Court granted the Parties' stipulation and ordered  
6 that the proceedings on the Motion to Dismiss and Motion for Leave to File Sur-Reply shall  
7 be stayed until December 5, 2022.

8 13. To provide the Parties with additional time to negotiate the terms of the  
9 settlement and to not jeopardize the settlement, on December 5, 2022, the Parties agreed that  
10 the Court should further stay the proceedings as it relates to the Motion to Dismiss and the  
11 Motion for Leave to File Sur-Reply for seven days, *i.e.*, to December 12, 2022.

12 14. The Parties submit that good cause exists to warrant the agreed to stipulation.  
13

14 Respectfully submitted,

15 December 5, 2022

16  
17 By /s/ Giorgio Sassine

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*Attorneys for PAYVISION B.V., a Netherlands  
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By /s/ Brianna Dahlberg  
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BROWN BROWN & PREMSRIRUT  
Puoy K. Premsrirut

ROME & ASSOCIATES, A.P.C.  
Brianna Dahlberg (Pro Hac Vice)  
Eugene Rome (Pro Hac Vice)

*Attorneys for New U Life Corporation*

**ORDER**

Based on the foregoing,

**IT IS SO ORDERED.**

DATED: December 6, 2022



ANNE R. TRAUM  
UNITED STATES DISTRICT COURT JUDGE